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February 1, 2017

The Honorable Ronnie Abrams United States District Judge Southern District of New York 40 Foley Square New York, New York 10007

Re: <u>United States v. Jason Galanis et al.</u> 16-cr-0371-4 (RA)

Dear Judge Abrams:

We represent Bevan Cooney, one of the defendants in above-referenced case. We write to join, so far as applicable to defendant Bevan Cooney, the Letter Motion made by counsel representing Devon Archer on February 1, 2017, to stay pending the resolution of Mr. Archer's anticipated expedited appeal to the United States Court of Appeals for the Second Circuit of the Order denying the Motion allowing Google to produce records responsive to a search warrant issued under the Stored Communications Act. (Dkt. 132)

Furthermore we intend to join the above mentioned appeal and will be filing notice shortly.

Thank you for your consideration.

Respectfully submitted,

/S/

Abraham J. Hassen Law Offices of Paula J. Notari Attorneys for Bevan Cooney

cc:

AUSA Brian Blais (via ECF & email) AUSA Rebecca Mermelstein (via ECF & email) AUSA Aimee Hector (via ECF & email) All Defense Counsel (via ECF) Bevan Cooney (via email)